## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Crim. No. 24-00089-01/02-CR-W-HFS Crim. Complaint No. 24-MJ-00038-01/02-LMC

SANFREDRICK STEELES, (01),

and

LARRY E. MOSBY, (02),

Defendants.

## **MOTION TO DISMISS CRIMINAL COMPLAINT**

Comes now Ashleigh A. Ragner, Assistant United States Attorney, and moves the Court to dismiss the Criminal Complaint filed on April 5, 2024, before United States Magistrate Judge Lajuana M. Counts, at Kansas City, Missouri, charging the defendants with violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), and 846 (Conspiracy to Distribute Methamphetamine).

Respectfully submitted,

Teresa A. Moore United States Attorney

By /s/Ashleigh A. Ragner

Ashleigh A. Ragner Assistant United States Attorney Violent Crime & Drug Trafficking Unit Charles Evans Whittaker Courthouse 400 East Ninth Street, Suite 5510 Kansas City, Missouri 64106 Telephone: (816) 426-3122

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was delivered on April 30, 2024, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/Ashleigh A. Ragner

Ashleigh A. Ragner Assistant United States Attorney